

POLREP NO: 10 (REMOVAL) **FINAL**



Date: July 31, 2000
Subject: Westbank Asbestos
From: John Martin, OSC, U.S. EPA, Region 6, RPB (214/665-6748)
To: Director, Office of Emergency & Remedial Response
Charles A. Gazda, Chief, ERB, Region 6
State Contact: LDEQ

Site No: Y6	CERCLIS No: LAD985170711
FPN No: n/a	ERRS D.O. #: 0016-06-637
Response Authority: CERCLA	ERNS No: n/a
NPL Status: n/a	Action Lead: Removal Funded
State Notification: LDEQ, LDHH	Start Date: 10/14/96
Incident Category: Other	Completion Date: 12/28/99
Action Memo: signed 08/23/96	Event Qualifier: TC
IAG No w/ USACE: DW96950233-01-0	WAF No: 96/01-COE33-Y600-V004

I. SITUATION INFORMATION

A. Site description

The Westbank Asbestos (WBA) site is located in the westbank area of New Orleans consisting of the Jefferson Parish communities of Bridge City, Westwego, Marrero, Harvey, and Gretna, and the Orleans Parish community of Algiers. These communities are in the vicinity of a former facility that operated in Marrero from 1929 to 1975. The facility reportedly gave away to local residents an asbestos-containing material (ACM) that was utilized as a substitute material for construction of driveways, walkways, and servitudes.

B. Description of threat

The threat posed by the WBA site was the release of the hazardous substance, asbestos. The air pathway was of greatest concern as inhalation of asbestos fibers has been shown to be cancer causing. While the air monitoring in the earliest investigations were mostly inconclusive, it became obvious that the ACM was progressively deteriorating and being released into the environment. Of the 582 ACM locations identified during the 1996 survey, 20-30% could be described as friable ACM with several ACM locations described as extremely friable. Comparing the ACM's structural integrity of the 1996 site assessment activities to the earlier site assessments, it was anticipated that the ACM locations would continue to rapidly deteriorate and become friable. Therefore, immediate action from EPA was necessary to address these publicly assessable ACM locations before the airborne release of asbestos fibers became a major problem.

C. Preliminary Assessment Results

The Environmental Protection Agency (EPA) and the Louisiana Department of Environmental Quality (LDEQ) first began assessing the WBA site in 1988. Periodic site inspections and monitoring indicated no ACM cleanup was needed at that time. However, in November 1995, concerns that the ACM had deteriorated to an unacceptable level prompted EPA to conduct a thorough re-assessment of the site. In January and February 1996, EPA and LDEQ conducted a street-by-street visual inspection of potential ACM areas. This inspection found approximately 600 locations with deteriorating ACM including driveways, rights-of-way, walkways, and playground areas. In most of these locations, mechanical disturbances such as walking, recreational activities, lawn maintenance, and driving were causing continued deterioration of the ACM.

The START visited the WBA site in March of 1996 to collect 60 bulk samples and 30 soil samples. Utilizing polarized light microscopy (PLM) analytical methods, the 60 bulk samples had an average percent asbestos value of 43%: 32% chrysotile; 9% crocidolite; and 2% amphiboles. The 30 soil samples were collected in drainage pathways at varying distances leading away from three different ACM areas. These were analyzed using transmission electron microscopy (TEM) analytical method with the recommended outlined by Chatfield 1988 "Analysis of Vinyl Floor Tile." The results indicated an asbestos concentration of 24% to 30% chrysotile/amphibole by weight.

D. Site History/Background

The apparent source of the ACM was from a Johns-Manville's manufacturing facility that reportedly operated from 1929 to 1975 in Marrero. The facility produced an asbestos-containing aggregate as a by-product during manufacturing operations. The asbestos aggregate formed a concrete-like material that when mixed with water and therefore was considered by many local residents to be a concrete substitute for construction purposes. During the period of 1955 to 1965, this ACM was offered to local residents. Consequently, many areas in the residential communities surrounding the former plant contain ACM waste.

E. Historical actions taken

The source of the concrete-like material containing asbestos was generated by the Marrero facility until 1975 and has not been regulated under current environmental regulations. No environmental agency has taken any abatement actions relating to the ACM found in the residential properties.

II. SITE INFORMATION

A. Site Activities to Date

Since POLREP #9 on 01/15/99, weekly progress reports have been documented via "SITREPs" which number SITREP #09 for 04/16/97 through SITREP #87 for 01/27/00.

On 12/07/99, EPA, START, USACE and OHM-IT personnel returned to the Westbank Asbestos site to complete the removal activities on the remaining properties in which access agreements were obtained. All the residential properties identified with ACM but without signed access agreements were re-approached to gain access. A total of six sites were "readied" to be excavated. Two of these six sites were being addressed a second time. Removal activities were completed 12/28/99. One excavation crew was used during this period.

For project totals, 2029 sites were investigated for ACM with 1393 sites identified to have had visible ACM. A total of 1365 separate properties were excavated and restored during this project with approximately 52,210 cubic yards of ACM and contaminated soil having been excavated and properly disposed.

From October 1996 until July 1998, removal activities were conducted continuously except for the scheduled holidays. At the end of July 1998, site crews were demobilized pending resolution of remaining sites. The remaining sites (approximately 30) were those without signed access agreements or newly identified sites. Other sites identified with ACM but not excavated were several businesses and very large sites (special sites). After re-approaching all the residential property owners that had not signed access agreements, site crews were mobilized on 11/09/98 to address the remaining "readied" sites and "re-digs" of previous sites. The ERRS contractor was added and tasked to provide the restoration portion of the project. Using one excavation crew, 26 properties were excavated and restored. Site excavation work was completed 12/12/98 and restoration activities continued for another week. The dismantling of the command post was begun. Approximately 30 properties were completed in 1996, a total of 992 properties completed in 1997, a total of 339 properties completed in 1998, and a total of 4

properties in 1999.

B. Next Steps

Finalized the site files.

C. Key Issues

Officials from LDEQ and Jefferson Parish were invaluable in their support and assistance throughout the project.

III. ACTIONS TAKEN

An IAG with the USACE was utilized for their Rapid Response Contract with IT Corp. The USACE was tasked to conduct the asbestos excavation, transportation, disposal, and restoration of the ACM locations. The START contractor's tasks included site assessment, air monitoring, soil sampling, public relations assistance, and other removal support activities. ACM was excavated to a depth of 6 inches to 12 inches depending on the utilization of each specific area and the restoration material to be used. The visible ACM was excavated from the surface in publicly accessible areas. The excavated areas were restored to as near to original conditions as possible by replacing the excavated ACM with soil/sod, rock or concrete.

IV. COST INFORMATION (as of 01/01/99)

	Amount Obligated	Cost to Date	AM Ceiling
IAG (USACE)	\$ 17,800,000	\$16,211,019*	\$21,000,000
START	\$ 642,271	\$ 607,336	\$ 600,000
ERRS	\$ 220,000**	\$ 114,355	0
Contingency	n/a	n/a	\$ 4,300,000
TOTAL	\$ 18,662,271	\$17,932,710	\$25,900,000

*CTD of USACE's Rapid Response Contract with a D.O. amount of \$16,233,660
USACE cost to project is apprx. 10% of Rapid's D.O. amount

**ERRS D.O. was modified from \$120,000